Although Comcast has ample experience in launching new products and services, the eligibility rules for Internet Essentials created a unique set of operational challenges. We sought to address these challenges while keeping the Internet Essentials application process as easy and efficient as possible, providing applicants with clear instructions, guidance and regular reminders throughout the process.

Operationalizing Eligibility

Our first hurdle was to determine how to verify eligibility of prospective customers. Although the USDA nationally standardizes NSLP eligibility criteria, an individual family obtains free lunch certification status on a local basis. In practice, there are variations among school district eligibility determinations. In addition, there are substantial privacy considerations and regulations associated with the NSLP that prevent the government from simply supplying a list of eligible families to a private company like Comcast.

We hired an established third-party verification specialist, Solix, to verify NSLP participation using copies of the annual notifications provided by school districts to students eligible to receive a free lunch. To support interested families through the application and verification process, we established a dedicated call center with specially trained agents. As noted above, our expert consultants also advised us that the NSLP population was experienced in using their NSLP status to apply for other benefits and services, so there would be a basic level of comfort with the eligibility and application process we were creating.

Congressman James Clyburn, FCC Commissioner Mignon Clyburn and Comcast EVP David L. Cohen congratulate a participant in the Comcast Digital Connectors program at the Carolina Youth Development Center in North Charleston, South Carolina.
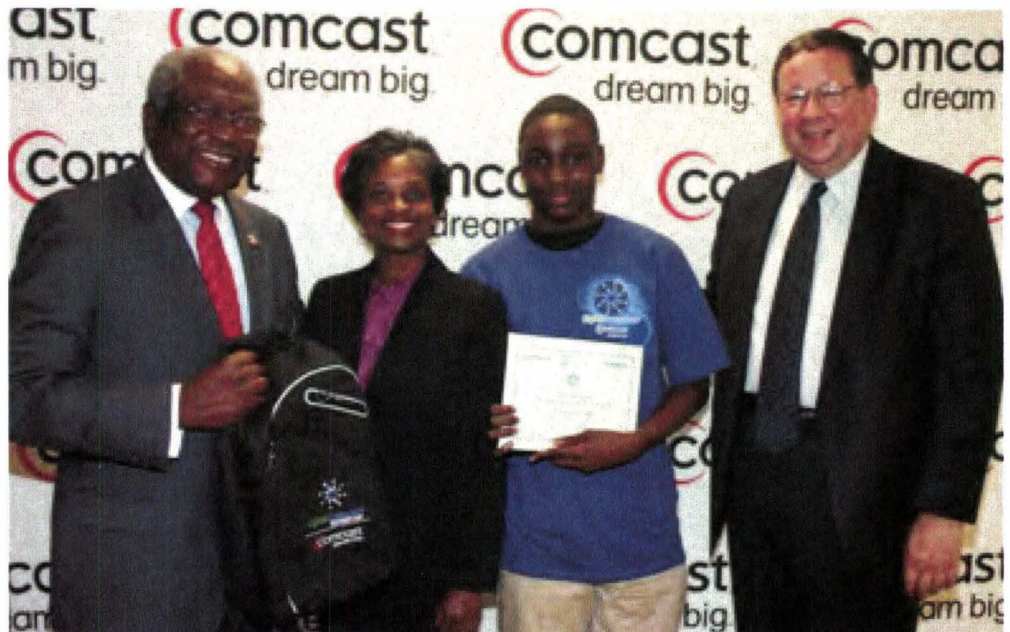
Improvements to Application Process

As we rolled out Internet Essentials, we improved the application process based on our observations of customer experience to ensure that the customer intake process did not materially hinder or delay families from enrolling in Internet Essentials. Changes made to date include the following:

- Shortly after launching the program, we comprehensively reviewed approximately 20 hours of recorded service request calls. Based on findings from that effort, we revised our call center script to more quickly and directly initiate the enrollment process.

- When we saw that some applications were not being returned, we initiated a "resend and remind" program, which automatically sent replacement application kits to those who failed to return their application within three weeks.

- To speed and simplify the application return process, we added the option for applicants to fax back applications. Additionally, we began accepting prior year free school lunch letters as supporting documentation.

- After observing some of the most common causes of non-approved applications, we began inserting a brightly colored reminder list into the application kit.

More improvements to the application process are underway. Research on families who requested applications but had not returned them revealed that gathering the required documentation was a possible barrier or point of delay. Thus, we are instituting an instant approval process for certain eligible families, such as those with children in Provision 2 schools, thereby allowing a person to complete the application over the phone without a separate verification step.[8] We estimate that 15% of free school lunch eligible families — over 300,000 households — will qualify for this expedited approval process. We will also be enabling organizations to purchase Internet Essentials in bulk on behalf of eligible low-income families in their community.

Internet Essentials Sign-up Process

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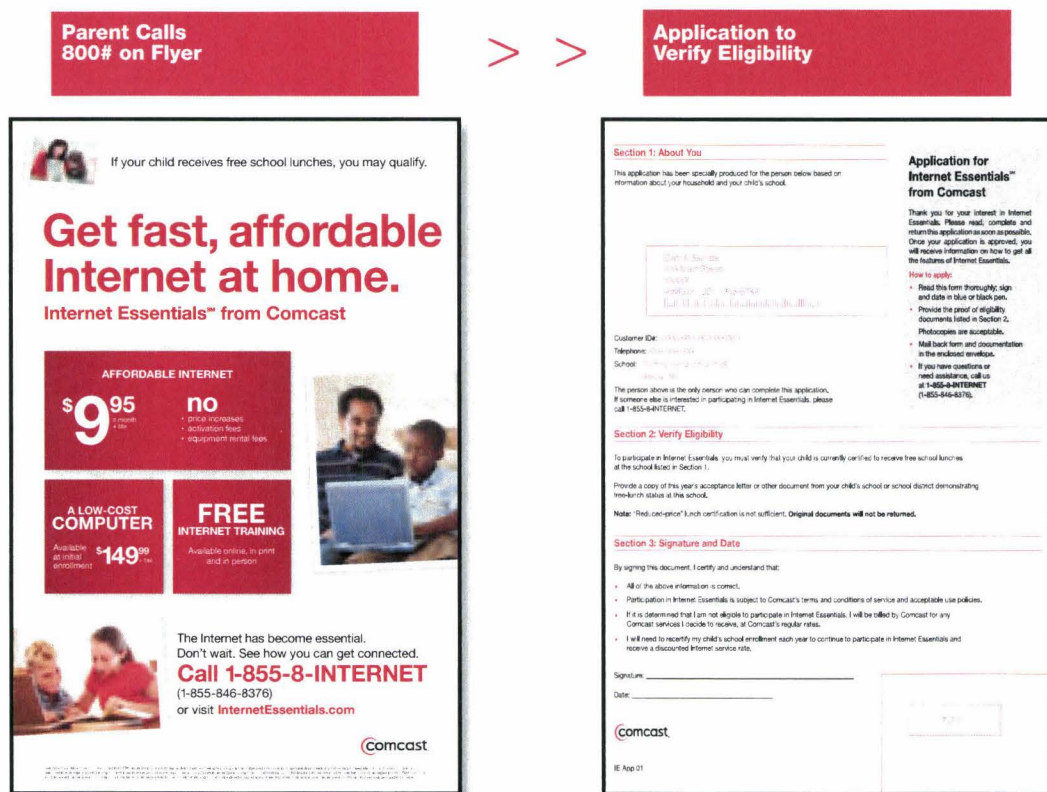
[8] Provision 2 is an option that enables schools and institutions to provide free meals to all of their students while reducing paperwork and administrative costs. While any school that articipates in the NSLP may opt for Provision 2, generally schools with high percentages of low-income students (75% or more) are able to utilize this option.

Other Unique Operational Challenges

There have been other operational challenges that required a unique approach for Internet Essentials customers, different from how we typically interface with customers:

- Comcast's general sales and billing platform was augmented to support and track the additional components of the Internet Essentials offer.

- The low-income population for whom Internet Essentials was designed encompasses a disproportionately large non-English speaking population. Thus, we had to be prepared to provide translation services and other support for this non-English speaking population.

Based on all these understandings and our experience with the program to date, we developed a workable way for getting customers through the application, verification, activation and installation processes. While there were some early challenges with the application process, our initial view that using NSLP as an eligibility gate would be understandable, navigable and efficient for the NSLP population generally proved to be accurate. Nevertheless, the substantial drop-off from applications requested to sign-up (a total of almost 46%) has led us to work on simplifying the process and to making a number of changes in an effort to drive that percentage higher.